



49403-68487 (RER)

need additional time to complete discovery in the event settlement is not achieved.

5. As such, an extension of the deadlines in this case would save the time and resources of both the parties and this Court.
6. The parties are requesting that the Court amend the Rule 16 Scheduling Order as follows:
  - a. Extend deadline for completing document production, depositions, interrogatories, subpoenas, and requests for admissions until December 31, 2011.
  - b. Extend deadline for filing dispositive motions until January 31, 2012.
  - c. Continue all remaining court appearances and trial as appropriate in light of revised deadlines.

WHEREFORE, for good cause shown, the parties jointly request this Honorable Court to amend the Rule 16 Scheduling Order. A proposed revised Rule 16 Scheduling Order will be submitted electronically to this Honorable Court.

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Respectfully submitted,

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